

REMARKS

Claims 1-13, 21 and 22 are pending. Applicants propose amendment of claims 1, 6 and 22. Entry of the amendments after final rejection is earnestly solicited.

Claims 1, 2 and 21 were rejected under 35 U.S.C. §102(e) as being anticipated by *Wada et al.* Favorable reconsideration is earnestly solicited.

Applicants propose amendment of claim 1 to incorporate features of claim 6. That is, claim 1 is amended to specify forming a fourth insulating layer on said substrate prior to formation of said first insulation layer. *Wada et al.* fails to teach or suggest the features of amended claim 1.

Claim 1 was rejected under 35 U.S.C. §102(e) as being anticipated by *Gambino et al.* Favorable reconsideration of this rejection is requested in view of the amendment proposed above. *Gambino et al.* fails to teach or suggest forming a fourth insulation layer on said substrate prior to formation of said first insulation layer.

Claims 1, 2, 4, 7-12 and 21 were rejected under 35 U.S.C. §103(a) as being unpatentable over *Hsieh et al.* in view of *Wada et al.* or *Jain et al.* Favorable reconsideration of this rejection is earnestly solicited.

The cited references fail to teach or suggest forming a fourth insulation layer on said substrate prior to formation of said first insulation layer.

Claims 7-9 were rejected under 35 U.S.C. §103(a) as being unpatentable over *Wada et al.*, *Gambino et al.* and *Hsieh et al.* and *Jain et al.*, as applied to claim 1, in view of *Ohbayashi et al.* *Ohbayashi et al.* fails to provide the teachings which the primary references lack.

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Applicants gratefully acknowledge that claim 22 has been allowed, and that claims 3, 5, 6 and 13 were objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form. As noted above, claim 1 has been amended to incorporate the feature of claim 6 of forming a fourth insulation layer on said substrate prior to formation of said first insulation layer.

For at least the foregoing reasons, the claimed invention distinguishes over the cited art and defines patentable subject matter. Favorable reconsideration is earnestly solicited.

Should the Examiner deem that any further action by applicants would be desirable to place the application in condition for allowance, the Examiner is encouraged to telephone applicants' undersigned attorney.

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In the event that this paper is not timely filed, Applicants respectfully petition for an appropriate extension of time. Please charge any fees for such an extension of time and any other fees which may be due with respect to this paper, to Deposit Account No. 50-2866.

Respectfully submitted,

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